

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
WESTERN DIVISION

UNITED STATES OF AMERICA,	)	CASE NO.: 3: 19 CR 4
	)	
Plaintiff,	)	JUDGE JAMES G. CARR
	)	
v.	)	
	)	
VINCENT S. ARMSTRONG,	)	<u>MOTION TO FILE MOTION</u>
	)	<u>REGARDING CONFLICT UNDER SEAL</u>
Defendant.	)	

The United States of America, by and through its counsel, Justin E. Herdman, United States Attorney, and Michelle M. Baeppler, Assistant United States Attorney, hereby moves this Court to allow the United States to file a motion under seal, requesting that the Court inquire into a potential conflict of interest. The specifics set forth in the motion are sensitive and raise issues of client confidentiality. The government will serve both counsel for defendants Armstrong and Lecron with the motion.

Respectfully submitted,

JUSTIN E. HERDMAN  
United States Attorney

By: /s/ Michelle M. Baeppler  
Michelle M. Baeppler (OH: 0065378)  
Assistant United States Attorney  
United States Court House  
801 West Superior Avenue, Suite 400  
Cleveland, OH 44113  
(216) 622-3995  
(216) 685-2378 (facsimile)  
Michelle.Baeppler@usdoj.gov

CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of February 2019 a copy of the foregoing document was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. All other parties will be served by regular U.S. Mail. Parties may access this filing through the Court's system.

/s/ Michelle M. Baeppler

Michelle M. Baeppler  
Assistant U.S. Attorney